UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

FILED FIXS OFFICE

2005 OCT | | P 2: 26

NORTH READING SCHOOL COMMITTEE, Plaintiff

v.

AS DISTRICT COURT DISTRICT OF MASS

Civ. No. 05-11162 RCL

BUREAU OF SPECIAL EDUCATION APPEALS of the MASSACHUSETTS DEPARTMENT of EDUCATION, MASSACHUSETTS DEPARTMENT OF EDUCATION, and TIMOTHY GRAFTON and COURTNEY GRAFTON, as Parents and Next Friend of M.G., Defendants.

MOTION TO IMPOUND EXHIBITS

The Defendants, Timothy and Courtney Grafton ("Parents"), hereby move the Court to enter an order impounding all exhibits, including the administrative record and the transcript of the hearing before the Bureau of Special Education Appeals, in order to preserve the confidentiality of the student, M.G. See: Webster Grove_School District v. Pulitzer Publishing Company, 898 F.2d 1371 (8th Cir. 1990).

Counsel for the Parents has discussed this matter with counsel for the North Reading

School Committee and the Bureau of Special Education Appeals and the Massachusetts

Department of Education who have indicated that they have no opposition to this request.

Respectfully submitted, Courtney and Timothy Grafton By their attorney,

Tim Sindelar, BBO #557273 Ames, Hilton, Martin & Sindelar 22 Putnam Avenue

Date: 10/07/2006

Cambridge, MA 02139 (617) 871-2140 Fax: (617) 871-2141

Certificate of Service

I hereby certify that I have served a copy of the foregoing documents on all counsel of record for each party by first class mail, postage prepaid.

Date: 10/7/2005

Tim Sindelar